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 7 In Pro Per

8 UNITED STATES DISTRICT COURT  
 9 CENTRAL DISTRICT OF CALIFORNIA

10 Iliana Fischer  
 11 [Signature] 11/2/22  
 12 Plaintiff

13 v.

14 Angela White (aka "Blac Chyna")  
 15  
 16 Defendant(s).

CASE NUMBER:

CV22-8019-JFW (PVCX)

To be supplied by the Clerk of  
 The United States District Court

Complaint

#### IV. STATEMENT OF FACTS

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3 1. On 10/11/18, plaintiff posted a rap song named,  
4 <sup>Insert #</sup> "Hate Me Too," on soundcloud.com/iliana. That song  
5 is written and performed by the plaintiff; and, it features her  
6 friend, a rapper named "Jordan Lee." "Jordan" and the  
7 plaintiff promoted the song on both of their Instagram  
8 profiles.  
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12 2. During their friendship and recording sessions,  
13 <sup>Insert #</sup> "Jordan" would complain to the plaintiff that the  
14 defendant was repeatedly "stealing" and replicating her  
15 ("Jordan") hair, clothing, and makeup styles. Jordan and  
16 the defendant knew of each other; perhaps through a  
17 mutual friend/producer, "Mally Mall." "Jordan" and defendant  
18 followed each other on Instagram. The plaintiff also knew/met  
19 "Mally Mall," who gave her tracks of music, but has not met  
20 the defendant.  
21

22 3. In winter 2020, plaintiff signed a Sony Distribution  
23 <sup>Insert #</sup> deal. The plaintiff's newest and second album, "Fuego",  
24 which included "Hate Me Too," were distributed via Sony  
25 in winter 2020-21 on all major online platforms.  
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2 4. On or around 6/21, "Jordan" somberly messaged  
3 <sup>Insert, #</sup> plaintiff that defendant has launched a career as a rapper  
4 and posted a new song and musicvideo called "Doom", on  
5 her Instagram profile. They were also distributed on some  
6 major online platforms.

7 "Doom" clearly plagiarized the "hook" (aka: chorus)  
8 in the plaintiff's song, "Hate Me Too", including  
9 duplicating the syncope. The tempo was faster, though  
10

11 5. In plaintiff's song "Hate Me Too", the hook  
12 <sup>Insert, #</sup> repeats 4 times:

13 "If I were you, I would hate me too,  
14 if I were you, I would hate me too,  
15 if I were you, I would hate me too,  
16 if I were you, I would hate me too-oo."  
17 (The last word, "too," was sung in two beats.)  
18  
19

20 6. In the defendant's song "Doom", the hook  
21 <sup>Insert, #</sup> repeats 4 times:

22 "If I was you, I'd hate me too,  
23 if I was you, I'd hate me too,  
24 if I was you, I'd hate me too,  
25 if I was you, I'd hate me too-oo"  
26 (The last word, "too," was sung in two beats.)  
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2 7. Ironically, the plaintiff's song "Hate Me Too," is  
3 <sup>Insert</sup> # about a jealous copycat cyberstalker who behaves like the  
4 antagonist in the film "Single White Female."  
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11 8. After being informed about the defendant's blatant  
12 <sup>Insert</sup> # plagiarism, the plaintiff communicated with some lawyers.  
13 Plaintiff was advised to search the copyright registration  
14 website and see if the defendant had copyrighted "Doom."  
15 Plaintiff did not find it registered there. Plaintiff was  
16 then advised to register "Hate Me Too" at the copyright  
17 registration website. She registered the lyrics and song  
18 on 6/14/21.  
19

20 9. On 7/21/21, the plaintiff emailed the defendant  
21 <sup>Insert</sup> # a Cease and Desist letter at blacchynabusiness@gmail.com.  
22 Plaintiff never received a reply other than an automated  
23 acknowledgement of having received the email.  
24

25 On 10/22/21, the plaintiff sent emails to the  
26 defendant at blacchynabusiness@gmail.com AND  
27 blacchyna@blacchyna.com, to notify her that she was  
28 considering filing a lawsuit of copyright infringement;  
but, plaintiff is willing to settle it in a boxing match on "Celebrity  
Boxing".

10. <sup>Insert</sup> Instead of replying to the plaintiff's request, the defendant remained silent and arranged her own boxing match appearance with a different opponent on "Celebrity Boxing." The match aired on Pay Per View on 7/11/22. Plaintiff believes defendant received monetary compensation for the appearance.

11. <sup>Insert</sup> The defendant has a public AND private history and reputation of poor character, lack of integrity, no compassion, borderline sociopathic behaviour, and, a tendency to parasite off of others. She has attempted to use others' name/title, intellectual property and/or artistic ideas for her own selfish gain of status, clout, publicity, and money.

Below are some examples:

12. <sup>Insert</sup> On 10/1/21, @theshaderoom on Instagram, posted that another rapper named "Jhonni Blaze" (@jhonniblazeduh), publicly accused defendant of copying the background and creative visuals of her music video.

On 4/3/17, gerbenlaw.com was involved in a lawsuit against defendant due to her illegal registration of her name as "Angela Renee KARDASHIAN" at the U.S. Patent and Trademark office BEFORE her marriage to Rob Kardashian.

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2 <sup>13</sup> On 11/15/17, thewrap.com posted news that the  
3 <sup>Insert ¶ #</sup> defendant was sued for posting a copyrighted photo on  
4 her Instagram profile. The photo was shot by FameFlynet  
5 and it was licensed for limited use. It bore a copyright  
6 watermark, which the defendant illegally removed and  
7 then illegally posted the photo on her social media.  
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11 <sup>14</sup> On 12/31/18, sandrarose.com posted news that  
12 <sup>Insert ¶ #</sup> Backgrid USA sued the defendant for copyright infringement  
13 seeking \$150,000 per photo posted 9/13/17 and 10/27/17  
14 on her Instagram profile, because the photos were  
15 not licensed to her.

16 On 5/7/22, dailybeast.com publicized that  
17 the defendant had assaulted a woman in an L.A. bar. She  
18 slammed the victims iphone to the ground and kicked her  
19 in the stomach.

20 <sup>15</sup> It is clear that the defendant lacks a  
21 <sup>Insert ¶ #</sup> conscience and integrity. It is therefore easy to  
22 conclude that she plagiarized "Hate Me Too," and  
23 intentionally, so.  
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2 16. In conclusion, not only has the plaintiff reached  
3 <sup>Insert</sup> # out to the defendant and cordially attempted to resolve  
4 this without the involvement of the judicial system; but,  
5 plaintiff has been ignored and received MORE thievery  
6 and humiliation when the defendant took plaintiff's  
7 "Celebrity Boxing" suggestion for her own monetary and  
8 publicity gain.  
9

10  
11 17. The plaintiff has managed to communicate  
12 <sup>Insert</sup> # with the defendant's attorneys via email and phone.  
13 They replied to the plaintiff via email in summer 2022,  
14 after plaintiff served a Summons to the defendant at  
15 her home, in an attempt to sue her at Van Nuys court.  
16 The judge there dismissed that case in order for it to  
17 be filed at the proper jurisdiction.  
18

19  
20 18. The judge, plaintiff, and defendant's attorney  
21 <sup>Insert</sup> # agreed that the new Summons could be served at  
22 the attorney's office instead of at defendant's  
23 home or place of employment. The defendant's lawyers  
24 appear to be cordial and very cooperative. They have  
25 been easily accessible and communicative.  
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2 19. The plaintiff believes that the copyright  
3 infringement is obvious and very easily provable.  
4 The plaintiff is a person of honesty, integrity,  
5 and compassion. For these reasons, the plaintiff  
6 believes the defendant's attorneys will be willing  
7 to settle this satisfactorily through court appointed  
8 mediation.  
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12 Insert #

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